December 12, 2002

RE: Swartzendruber Hardwood Creations, LLC 039-13732-00423
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Swartzendruber Hardwood Creations, LLC
1100 Chicago Avenue
Goshen, Indiana 46528

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-13732-00423	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 12, 2002 Expiration Date: December 12, 2007

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Compliance Determination Requirements [326 IAC 2-1.1-11]
D.1.5 Particulate

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 are descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom made wood furniture and furniture piece manufacturing source.

Authorized Individual:	Administrative Director
Source Address:	1100 Chicago Avenue, Goshen, Indiana 46528
Mailing Address:	1100 Chicago Avenue, Goshen, Indiana 46528
General Source Phone:	219 - 534 - 2502
SIC Code:	2511
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Two (2) cutting and sanding operations, identified as Production and Custom, constructed in 1985, equipped with cyclones and baghouses, capacity: 791 pounds of wood per hour, total.

(b) One (1) spray booth, identified as Custom, constructed in 1985, using high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausted to Stack V2, capacity: 123 pounds of wood per hour.

(c) One (1) spray booth, identified as Production, constructed in 1985, using high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausted to Stack V1, capacity: 505 pounds of wood per hour.

(d) Five (5) natural gas-fired boilers, identified as H1 through H5, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(e) Four (4) natural gas-fired space heaters, identified as H6 through H9, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(f) One (1) up-draft furnace, firing natural gas, identified as H10, constructed in 1985, rated at 0.15 million British thermal units per hour.

(g) Two (2) natural gas-fired radiant heaters, identified as H11 and H12, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(h) One (1) assembly area, identified as Custom, using hand application, capacity: 120 pounds of wood per hour.

(i) One (1) assembly area, identified as Production, using hand application, capacity: 502 pounds of wood per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to 326 IAC 2-6.1-6(d)(3):

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-6.1-4(4)(C)]

(a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading unless otherwise specified in this permit.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading unless otherwise specified in this permit.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report

Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) cutting and sanding operations, identified as Production and Custom, constructed in 1985, equipped with cyclones and baghouses, capacity: 791 pounds of wood per hour, total.

(b) One (1) spray booth, identified as Custom, constructed in 1985, using high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausted to Stack V2, capacity: 123 pounds of wood per hour.

(c) One (1) spray booth, identified as Production, constructed in 1985, using high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausted to Stack V1, capacity: 505 pounds of wood per hour.

(d) Five (5) natural gas-fired boilers, identified as H1 through H5, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(e) Four (4) natural gas-fired space heaters, identified as H6 through H9, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(f) One (1) up-draft furnace, firing natural gas, identified as H10, constructed in 1985, rated at 0.15 million British thermal units per hour.

(g) Two (2) natural gas-fired radiant heaters, identified as H11 and H12, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(h) One (1) assembly area, identified as Custom, using hand application, capacity: 120 pounds of wood per hour.

(i) One (1) assembly area, identified as Production, using hand application, capacity: 502 pounds of wood per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to

substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the one (1) spray booth, identified as Custom, and the one (1) spray booth, identified as Production, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2, the particulate from the cutting and sanding operations shall not exceed 2.20 pounds per hour when operating at a process weight rate of 791 pounds per hour (0.396 tons per hour).

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.4 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the five (5) natural gas-fired boilers, identified as H1 through H5, each rated at 0.15 million British thermal units per hour, shall not exceed 0.6 pounds per million British thermal units.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Particulate

The baghouses and cyclones for particulate control shall be in operation at all times when the cutting and sanding operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. :_____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:
Address:
City:
Phone #:
MSOP #:

I hereby certify that Swartzendruber Hardwood Creations, LLC is **9** still in operation.
9 no longer in operation.

I hereby certify that Swartzendruber Hardwood Creations, LLC is
9 in compliance with the requirements of MSOP **039-13732-00423.**
9 not in compliance with the requirements of MSOP **039-13732-00423.**

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit

Source Name:	**Swartzendruber Hardwood Creations, LLC**
Source Location:	**1100 Chicago Avenue, Goshen, Indiana 46528**
County:	**Elkhart**
Construction Permit No.:	**MSOP 039-13732-00423**
SIC Code:	**2511**
Permit Reviewer:	**Edward A. Longenberger**

On November 5, 2002, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Swartzendruber Hardwood Creations, LLC had applied for a operating permit to operate a custom made wood furniture and furniture piece manufacturing source with cyclones, baghouses and dry filters as particulate control. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the construction permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

IDEM, OAQ is no longer going to include the phone number of the contact person, because it is cumbersome to do a notice only change every time the source changes the phone number. But a general source phone number has been requested by local agencies and inspectors, so a general number will replace the contact person's phone number. "County Status" has been replaced with "Source Location Status" in order to clarify when only portions of a county are non-attainment:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom made wood furniture and furniture piece manufacturing source.

Authorized Individual:	Administrative Director
Source Address:	1100 Chicago Avenue, Goshen, Indiana 46528
Mailing Address:	1100 Chicago Avenue, Goshen, Indiana 46528
General Source Phone ~~Number~~:	219 - 534 - 2502
SIC Code:	2511
County Location:	Elkhart
~~County~~ **Source Location** Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

Change 2:

Conditions B.2 (Definitions) and B.5 (Modification to Permit) have been revised and Condition B.4 (Permit Term and Renewal) has been added to the permit. These conditions replace existing Conditions B.5 and B.6:

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

~~Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all~~ **All** requirements and conditions of this ~~construction~~ **operating** permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

~~B.5 Minor Source Operating Permit [326 IAC 2-6.1]~~

~~(a) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).~~

~~(b) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in this permit. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.~~

~~B.6 Permit Term [326 IAC 2-6.1-7]~~

~~This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration date.~~

Change 3:

Annual Notification has been moved to Section B from Section C:

B.6 ~~C.21~~ Annual Notification [326 IAC 2-6.1-5(a)(5)]

Change 4:

Condition B.7 (Preventive Maintenance Plan) has been moved to Section B from Section C. The language "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In (c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAQ requests it. The record keeping requirements have been added to this condition as follows:

B.7~~C.3~~ Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) **A copy of the** PMPs shall be submitted to IDEM, OAQ, upon request **and within a reasonable time**, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

Change 5:

Condition B.8 (Permit Revision) has been moved to Section B from Section C. Paragraph (a) has been revised because IDEM, OAQ, does not want a source to be liable for both a permit violation and a rule violation. By changing this language IDEM, OAQ, is merely referencing the requirements and not mandating compliance with it. Paragraph (b) has been changed to replace "should" with "shall", and "the" authorized individual has been replaced with "an" authorized individual, because the rule does not specify that it has to be one individual. This change was made throughout the permit

B.8~~C.4~~ Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) ~~The Permittee must comply with~~ **Permit revisions are governed by** the requirements of 326 IAC 2-6.1-6 ~~whenever the Permittee seeks to amend or modify this permit~~.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

Change 6:

Conditions B.9 (Inspection and Entry) and B.10 (Transfer of Ownership) have both been moved to Section B from Section C.

B.9~~C.5~~ Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

B.10~~C.6~~Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Change 7:

Condition B.11 (Annual Fee Payment) was added to the permit as follows:

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

Change 8:

Condition C.1 (Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) has been added as follows:

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

Change 9:

Conditions C.1 (PSD Minor Source Status) and C.2 (Hazardous Air Pollutants) have been removed from the permit as follows:

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

~~(a) The total source potential to emit of PM, PM_{10}, SO_2, VOC, NO_x and CO is less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

~~(b) Any change or modification which may increase the potential to emit PM_{10}, SO_2, VOC, NO_x or CO to one hundred (100) tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.~~

~~C.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]~~

~~Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.~~

Change 10:

Condition C.2 (Permit Revocation) rule cite was corrected:

C.2 Permit Revocation ~~[326 IAC 2-1-9]~~ **[326 IAC 2-1.1-9]**

Change 11:

In Condition C.4, the statement that "326 IAC 6-4-2(4) is not federally enforceable" has been removed:

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

Change 12:

Condition C.6 (Asbestos Abatement Projects) has been added as follows:

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Change 13:

Condition C.7 (Performance Testing) has been rearranged for clarity. Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the authorized individual. In paragraph (c), "within" has been changed to "not later than".

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

~~(b)~~**(c) Pursuant to 326 IAC 3-6-4(b), all** ~~All~~ test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

Change 14:

Condition C.8 Compliance Requirements is a new condition that refers to our general compliance authority in 326 IAC 2-1.1-11:

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Change 15:

The following rule cites have been added to Condition C.10:

C.10 Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60, Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

Change 16:

Condition C.11 (Pressure Gauge and Other Instrument Specifications) has been revised. This removes the consideration of pH in (b) and includes a new (c) for pH:

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

(a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale

and be accurate within plus or minus two percent (±2%) of full scale reading **unless otherwise specified in this permit**.

(b) Whenever a condition in this permit requires the measurement of a temperature **or** flow rate ~~or pH level~~, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading **unless otherwise specified in this permit**.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Change 17:

Condition C.12 (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised as follows. “Corrective actions” has been changed to “response actions” to be consistent with the rest of the permit:

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected emissions unit while the ~~corrective~~ **response** actions are being implemented. ~~IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.~~

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1.

Change 18:

Condition C.14 (Emission Statement) language was added to clarify that regulated pollutants are defined in 326 IAC 2-7-1. "Estimated" was added to paragraphs (a)(1) and (a)(2) because that is how 326 IAC 2-6 describes emissions:

C.14 ~~Annual~~ Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate **estimated** actual emissions of other regulated pollutants **(as defined by 326 IAC 2-7-1)** from the source, for purposes of Part 70 fee assessment.

Change 19:

Condition C.19 (Monitoring Data Availability) has been removed:

~~C.19 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

~~(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~

~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~

~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

Change 20:

Condition C.15 (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that they get a "reasonable time" to produce records no matter how or when we ask for them. Paragraphs (b) and (c) have been removed because they were unnecessary:

C.15 General Record Keeping Requirements [326 IAC 2-6.1-~~2~~ **5**]

(a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAQ representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~ **(b) Unless otherwise specified in this permit, a**~~A~~ll record keeping requirements not already legally required shall be implemented when operation begins.

Change 21:

Compliance monitoring reports are not required by 326 IAC 2-6.1; therefore, references to compliance monitoring reports have been removed from the General Reporting Requirements condition. The annual compliance certification is sufficient:

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13] (Mandatory)

~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b)~~**(a)** ~~The report required in (a) of this condition and~~ **R**eports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~(c)~~ **(b)** Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

~~(d)~~ **(c)** Unless otherwise specified in this permit, any quarterly report **required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) A malfunction as described in 326 IAC 1-6-2; or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required~~

~~compliance monitoring is a deviation.~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g)~~ **(d)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

Change 22:

Conditions D.1.4 and D.1.5 (Particulate) were revised to remove "Matter" and "PM" from the conditions, because 326 IAC 6 regulates Particulate Emissions rather than Particulate Matter Emissions:

D.1.4 Particulate ~~Matter (PM)~~ [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the ~~PM~~ **particulate** emissions from the five (5) natural gas-fired boilers, identified as H1 through H5, each rated at 0.15 million British thermal units per hour, shall not exceed 0.6 pounds per million British thermal units.

D.1.5 Particulate ~~Matter (PM)~~

The baghouses and cyclones for ~~PM~~ **particulate** control shall be in operation at all times when the cutting and sanding operations are in operation.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit

Source Background and Description

Source Name:	**Swartzendruber Hardwood Creations, LLC**
Source Location:	**1100 Chicago Avenue, Goshen, Indiana 46528**
County:	**Elkhart**
SIC Code:	**2511**
Operation Permit No.:	**MSOP 039-13732-00423**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed an application from Swartzendruber Hardwood Creations, LLC relating to the operation of a custom made wood furniture and furniture piece manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Two (2) cutting and sanding operations, identified as Production and Custom, constructed in 1985, equipped with cyclones and baghouses, capacity: 791 pounds of wood per hour, total.

(b) One (1) spray booth, identified as Custom, constructed in 1985, using high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausted to Stack V2, capacity: 123 pounds of wood per hour.

(c) One (1) spray booth, identified as Production, constructed in 1985, using high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausted to Stack V1, capacity: 505 pounds of wood per hour.

(d) Five (5) natural gas-fired boilers, identified as H1 through H5, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(e) Four (4) natural gas-fired space heaters, identified as H6 through H9, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

(f) One (1) up-draft furnace, firing natural gas, identified as H10, constructed in 1985, rated at 0.15 million British thermal units per hour.

(g) Two (2) natural gas-fired radiant heaters, identified as H11 and H12, constructed in 1985, rated at 0.15 million British thermal units per hour, each.

The following emission units were not specifically permitted in CP 039-6939-00423, but were constructed and operated after 1996 at exemption levels:

(h) One (1) assembly area, identified as Custom, using hand application, capacity: 120 pounds of wood per hour.

(i) One (1) assembly area, identified as Production, using hand application, capacity: 502 pounds of wood per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new facilities proposed at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Registration 039-6939-00423, issued on December 2, 1996.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
H1-H5	boilers	50	0.25	500	200
H6-H9	space heaters	15	0.33	500	200
H10	up-draft furnace	15	0.33	500	200
H11-H12	radiant heater	10	0.25	500	200
V1	production paint booth	17	3.33	6,000	70
V2	custom paint booth	16	1.00	1,000	70

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 28, 2000, with additional information received on February 26, 2001 and June 4, 2001. The application was submitted within the appropriate time frame, within twenty-four (24) months of the effective date of 326 IAC 2-5.5.

Emission Calculations

See pages 1 through 6 of 6 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	**Potential To Emit** (tons/year)
PM	64.7
PM_{10}	64.7
SO_2	0.005
VOC	23.4
CO	0.662
NO_X	0.788

HAPs	**Potential To Emit** (tons/year)
2-butoxyethanol	0.283
MEK	3.92
Toluene	4.58
MIBK	0.599
Glycol Ethers	0.343
Methanol	0.506
TOTAL	10.2

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM_{10} are equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(b) The potential PM emissions in the above table include emissions from woodworking operations. The potential to emit from woodworking was calculated using two methodologies (see page 3 of 6 of TSD Appendix A), one using applicant supplied outlet grain loading data and one using a collected material sample. Either method results in a potential PM emissions greater than twenty-five (25) tons per year, and the worst case potential to emit is shown above.

(c) The source was issued a Registration (039-6939-00423) on December 2, 1996. At the time the Registration was issued, the potential to emit from woodworking operations was determined by taking the lesser of the allowable PM emission rate pursuant to 326 IAC 6-3-2 and the calculated potential to emit after controls. The IDEM, OAQ has since revised its policy regarding calculation of potential emissions from woodworking operations in order to be consistent with the definition of potential to emit as defined in 326 IAC 2-1.1-1(16). The potential emissions from woodworking are calculated before controls.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Woodworking equipment	9.64	63.6	0.00	0.00	0.00	0.00	0.00
Assembly Areas	0.00	0.00	0.00	0.021	0.00	0.00	0.00
Custom paint booth	0.411	0.411	0.00	11.6	0.00	0.00	5.49
Production paint booth	0.653	0.653	0.00	11.7	0.00	0.00	4.74
Natural gas combustion	0.015	0.060	0.005	0.043	0.662	0.788	0.015
Total Emissions	10.7	64.7	0.005	23.4	0.662	0.788	10.2

All values in the above table represent the unrestricted potential to emit, except the PM value for woodworking which reflects the allowable emissions pursuant to 326 IAC 6-3-2.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, with the total emissions indicated in this permit MSOP 039-13732-00423, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPS is less than twenty-five (25) tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63.800, Subpart JJ), because the source has a potential to emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per for combination HAPs.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The five (5) natural gas-fired boilers, identified as H1 through H5, installed in 1985, each rated at 0.15 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, which-ever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The total heat input capacity for the source is 0.75 million British thermal units per hour.

$Pt = 1.09/(0.75)^{0.26} = 1.17$ lb/MMBtu heat input

Pursuant to 326 IAC 6-2-4(a), if Q is less than ten (10) million British thermal units per hour, Pt shall not exceed 0.6. Therefore:

Pt = 0.6 pounds per million British thermal units.

Based on Appendix A, the worst case potential PM emission rate from this boiler is:

0.025 ton/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.0057 lb/hr
(0.0057 lb/hr / 0.75 MMBtu/hr) = 0.008 lb PM per MMBtu

Therefore, the five (5) natural gas-fired boilers, identified as H1 through H5, will comply with this rule.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

(a) Particulate from the one (1) spray booth, identified as Custom, and the one (1) spray booth, identified as Production, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(b) Pursuant to 326 IAC 6-3-2, the particulate from the cutting and sanding operations shall not exceed 2.20 pounds per hour when operating at a process weight rate of 791 pounds per hour (0.396 tons per hour).

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The associated cyclones and baghouses shall be in operation at all times the cutting and sanding operations are in operation, in order to comply with this rule.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-1(a)(3), the surface coating operations at this source which were existing as of July 1, 1990 and located in Elkhart County, with actual VOC emissions greater than fifteen (15) pounds per day are subject to the requirements of 326 IAC 8-2. This source is subject to 326 IAC 8-2-12 because it coats wood furniture and wood furniture pieces. Pursuant to this rule, the owner or operator shall apply all coating material, with the exception of no more than ten (10) gallons of

coating per day used for touch-up and repair operations, using one (1) or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source uses high volume, low pressure (HVLP) spray equipment, which is equivalent to airless spray application. Therefore, the source is in compliance with 326 IAC 8-2-12.

Conclusion

The operation of this custom made wood furniture and furniture piece manufacturing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-13732-00423.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Swartzendruber Hardwood Creations, LLC
Address City IN Zip: 1100 Chicago Avenue, Goshen, Indiana 46528
MSOP: 039-13732
Plt ID: 039-00423
Reviewer: Edward A. Longenberger
Date: December 28, 2000

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PRODUCTION PAINT BOOTH																
Topcoat L42C04 130HAW	7.83	71.13%	0.10%	71.03%	0.09%	21.50%	0.00029	114.610	5.57	5.56	0.185	4.436	0.810	0.082	25.87	75%
Sealer L42C04 150 HAWR	7.66	72.65%	0.10%	72.55%	0.09%	19.80%	0.00217	114.610	5.56	5.56	1.382	33.171	6.054	0.571	28.07	75%
Cleaner																
Pure Lacquer Thinner	7.01	100.00%	0.20%	99.80%	0.17%	50.00%	0.00138	114.610	7.01	7.00	1.106	26.556	4.846	0.000	13.99	75%
								PM	Control Efficiency	90.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**2.67**	**64.16**	**11.7**	**0.653**		
									Controlled		**2.67**	**64.16**	**11.7**	**0.065**		

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
CUSTOM PAINT BOOTH																
Topcoat L42C04 130HAW	7.83	71.13%	0.10%	71.03%	0.09%	21.50%	0.00289	27.510	5.57	5.56	0.442	10.612	1.937	0.197	25.87	75%
Sealer L42C04 150 HAWR	7.66	72.65%	0.10%	72.55%	0.09%	19.80%	0.00211	27.510	5.56	5.56	0.323	7.742	1.413	0.133	28.07	75%
Cleaner																
Pure Lacquer Thinner	7.01	100.00%	0.20%	99.80%	0.17%	50.00%	0.00134	27.510	7.01	7.00	0.258	6.189	1.130	0.000	13.99	75%
Stripper																
Methyl Ethyl Ketone	6.75	100.00%	0.55%	99.45%	0.45%	50.00%	0.00079	142.120	6.74	6.71	0.754	18.088	3.301	0.000	13.43	75%
Stain																
Danish Oil Finish	7.16	100.00%	0.00%	100.00%	0.00%	23.00%	0.00383	27.510	7.16	7.16	0.754	18.106	**3.304**	0.000	31.13	75%
Clear Wiping Stain Base	6.50	89.28%	0.07%	89.21%	0.05%	10.72%	0.00383	27.510	5.80	5.80	0.611	14.663	2.676	0.080	54.09	75%
Dye Stain	6.75	97.64%	18.65%	78.99%	15.11%	2.36%	0.00383	27.510	6.28	5.33	0.562	13.483	2.461	0.018	225.92	75%
Thinners																
Exxon Mineral Spirits	6.50	100.00%	0.01%	99.99%	0.01%	50.00%	0.00064	27.510	6.50	6.50	0.114	2.746	0.501	0.000	13.00	75%
Sun Co. Mineral Spirits	6.58	100.00%	0.00%	100.00%	0.00%	50.00%	0.00064	27.510	6.58	6.58	0.116	2.780	**0.507**	0.000	13.16	75%
Methanol	6.60	99.50%	71.50%	28.00%	56.66%	50.00%	0.00064	27.510	4.26	1.85	0.033	0.781	0.143	0.001	3.70	75%
Naptha	6.80	100.00%	8.38%	91.62%	6.84%	50.00%	0.00064	27.510	6.69	6.23	0.110	2.633	0.480	0.000	12.46	75%
								PM	Control Efficiency	90.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**2.65**	**63.52**	**11.6**	**0.411**		
									Controlled		**2.65**	**63.52**	**11.6**	**0.041**		

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
ASSEMBLY AREAS																
Assembly 161	9.00	56.40%	55.51%	0.89%	59.95%	50.00%	0.00032	142.120	0.20	0.08	0.004	0.087	0.016	0.000	0.16	100%
Titebond Regular Brown	9.66	57.70%	57.44%	0.26%	66.63%	50.00%	0.00032	142.120	0.08	0.03	0.001	0.027	0.005	0.000	0.05	100%
								PM	Control Efficiency	0.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**0.005**	**0.115**	**0.021**	**0.00**		
									Controlled		**0.005**	**0.115**	**0.021**	**0.00**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Custom Paint Booth Potential Emissions: Worst case Stain and Worst case Thinner used
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Swartzendruber Hardwood Creations, LLC
Address City IN Zip: 1100 Chicago Avenue, Goshen, Indiana 46528
MSOP: 039-13732
Plt ID: 039-00423
Reviewer: Edward A. Longenberger
Date: December 28, 2000

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % 2-butoxyethanol	Weight % MEK	Weight % Toluene	Weight % MIBK	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (tons/yr)	2-butoxyethanol Emissions (tons/yr)	MEK Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Methanol Emissions (tons/yr)
PRODUCTION PAINT BOOTH																	
Topcoat L42C04 130HAW	7.83	0.00029	114.610	0.00%	2.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00	0.02	0.00	0.08	0.00	0.00	0.00
Sealer L42C04 150 HAWR	7.66	0.00217	114.610	0.00%	2.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00	0.17	0.00	0.58	0.00	0.00	0.00
Cleaner																	
Pure Lacquer Thinner	7.01	0.00138	114.610	0.00%	0.00%	10.00%	60.00%	10.00%	0.00%	0.00%	0.00	0.00	0.49	2.91	0.49	0.00	0.00
										Individual Total	**0.00**	**0.190**	**0.486**	**3.58**	**0.486**	**0.00**	**0.00**
										Overall Total	**4.74**						

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % 2-butoxyethanol	Weight % MEK	Weight % Toluene	Weight % MIBK	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (tons/yr)	2-butoxyethanol Emissions (tons/yr)	MEK Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Methanol Emissions (tons/yr)
CUSTOM PAINT BOOTH																	
Topcoat L42C04 130HAW	7.83	0.00289	27.510	0.00%	2.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00	0.05	0.00	0.19	0.00	0.00	0.00
Sealer L42C04 150 HAWR	7.66	0.00211	27.510	0.00%	2.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.14	0.00	0.00	0.00
Cleaner																	
Pure Lacquer Thinner	7.01	0.00134	27.510	0.00%	0.00%	10.00%	60.00%	10.00%	0.00%	0.00%	0.00	0.00	0.11	0.68	0.11	0.00	0.00
Stripper																	
Methyl Ethyl Ketone	6.75	0.00079	142.120	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	3.32	0.00	0.00	0.00	0.00
Stain																	
Dye Stain	6.75	0.00383	27.510	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.34	0.00
Thinners																	
Methanol	6.60	0.00064	27.510	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	99.50%	0.00	0.00	0.00	0.00	0.00	0.00	0.51
										Individual Total	**0.00**	**0.093**	**3.43**	**1.01**	**0.113**	**0.343**	**0.506**
METHODOLOGY										**Overall Total**	**5.49**						
										Worst Case Single Hap	**4.58**	**Toluene**					
										Total HAPs	**10.2**						

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Baghouse Operations

Company Name: **Swartzendruber Hardwood Creations, LLC**
Address City IN Zip: **1100 Chicago Avenue, Goshen, Indiana 46528**
MSOP: **039-13732**
Plt ID: **039-00423**
Reviewer: **Edward A. Longenberger**
Date: **December 28, 2000**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM / PM10 Emission Rate before Controls (lb/hr)	PM / PM10 Emission Rate before Controls (tons/yr)	PM / PM10 Emission Rate after Controls (lb/hr)	PM / PM10 Emission Rate after Controls (tons/yr)
P1	99.9%	0.000085	5100.0	3.7	16.27	0.004	0.016
P2	99.9%	0.000085	3950.0	2.9	12.61	0.003	0.013
P3	99.9%	0.000085	3000.0	2.2	9.57	0.002	0.010
				Total	38.5		0.038

Methodology
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Unit ID		Particulate Collected (lb/hr)	Collection Efficiency (%)	PM / PM10 Emission Rate before Controls (lb/hr)	PM / PM10 Emission Rate before Controls (tons/yr)
P1	cyclone	8.48	65.0%	13.992	61.285
P1	baghouse	0.23	99.9%	0.460	2.014
P2	baghouse	0.02	99.9%	0.040	0.175
P3	baghouse	0.01	99.9%	0.020	0.088
			Total	**14.512**	**63.561**

Methodology
Applicant supplied particulate collection rates and collection efficiencies
Emission Rate in lbs/hr (before controls) = Particulate collected (lbs/hr) / (1+collection efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Swartzendruber Hardwood Creations, LLC**
Address City IN Zip: **1100 Chicago Avenue, Goshen, Indiana 46528**
MSOP: **039-13732**
Plt ID: **039-00423**
Reviewer: **Edward A. Longenberger**
Date: **December 28, 2000**

Unit ID	Capacity
H1-H5	0.75
H6-H9	0.60
H10	0.15
H11-H12	0.30
Total	**1.80**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.80	15.77

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.015	0.060	0.005	0.788	0.043	0.662

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

HAPs Emissions

Company Name: **Swartzendruber Hardwood Creations, LLC**
Address City IN Zip: **1100 Chicago Avenue, Goshen, Indiana 46528**
MSOP: **039-13732**
Plt ID: **039-00423**
Reviewer: **Edward A. Longenberger**
Date: **December 28, 2000**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.656E-05	9.461E-06	5.913E-04	1.419E-02	2.681E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	3.942E-06	8.672E-06	1.104E-05	2.996E-06	1.656E-05	0.015

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Total Source Emissions Summary

Company Name: **Swartzendruber Hardwood Creations, LLC**
Address City IN Zip: **1100 Chicago Avenue, Goshen, Indiana 46528**
MSOP: **039-13732**
Plt ID: **039-00423**
Reviewer: **Edward A. Longenberger**
Date: **December 28, 2000**

Total Source Emissions Summary

Potential to Emit

Emission Unit	PM Potential to Emit (tons/yr)	PM-10 Potential to Emit (tons/yr)	SO2 Potential to Emit (tons/yr)	NOx Potential to Emit (tons/yr)	VOC Potential to Emit (tons/yr)	CO Potential to Emit (tons/yr)
Natural Gas Combustion	0.015	0.060	0.005	0.788	0.043	0.662
Woodworking Operations	63.561	63.561	0.000	0.000	0.000	0.000
Surface Coating	1.064	1.064	0.000	0.000	23.321	0.000
Total	**64.6**	**64.7**	**0.005**	**0.788**	**23.4**	**0.662**

Emissions after controls

Emission Unit	PM Potential Emission (tons/yr)	PM-10 Potential Emission (tons/yr)	SO2 Potential Emission (tons/yr)	NOx Potential Emission (tons/yr)	VOC Potential Emission (tons/yr)	CO Potential Emission (tons/yr)
Natural Gas Combustion	0.015	0.060	0.005	0.788	0.043	0.662
Woodworking Operations	0.038	0.038	0.000	0.000	0.000	0.000
Surface Coating	0.106	0.106	0.000	0.000	23.321	0.000
Total	**0.159**	**0.204**	**0.005**	**0.788**	**23.4**	**0.662**